## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

WILLIAM E. DUGAN, et al.,	)	
	)	CIVIL ACTION
Plaintiffs,	)	
	)	NO. 07 C 4468
VS.	)	
	)	JUDGE ROBERT A. GUZMAN
BOUIE CONSTRUCTION, INC.,	)	
an Illinois corporation,	)	
<del>-</del>	)	
Defendant	)	

## MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, BOUIE CONSTRUCTION, INC., an Illinois corporation, in the total amount of \$59,748.70, plus Plaintiffs' costs and reasonable attorneys' fees in the amount of \$885.00.

On August 15, 2007, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Maria Jonus) at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on September 4, 2007. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/	Beverly P. Alfon	
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## **CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 11th day of September 2007:

Mr. William T. Kaplan, Registered Agent Bouie Construction, Inc. 111 N. Ottawa Street Joliet, IL 60432

/s/ Beverly P. Alfon

Beverly P. Alfon Attorney for Plaintiffs BAUM SIGMAN AUERBACH & NEUMAN, LTD. 200 West Adams Street, Suite 2200 Chicago, IL 60606-5231

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